REMARKS

Applicants request favorable reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

Claims 1, 3, 4, 7, 9-12, 27-29, 31-33, 38, and 42-57 are pending in this application, with claims 1, 27-29, 31, 38, 42, 46, 48, 51, and 54-57 being independent. By this Amendment, Applicants have amended claims 1, 28, and 31. Applicants submit that no new matter has been added.

Claims 1, 3, 4, 7, 9-12, 22, 27-29, 31, 38 and 42-57 have been rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,029,182 (Nehab et al.) in view of U.S. Patent No. 6,012,083 (Savitzky et al.). Claims 32 and 33 have been rejected under 35 U.S.C. § 103(a) as being obvious over Nehab et al. in view of Savitzky et al., and further in view of U. S. Patent No. 5,633,996 (Hayashi et al.). These rejections are respectfully traversed.

Independent Claim 1 is generally directed to a method, operable in a first application upon a local machine, of forming a single continuous printable document by collating a plurality of hyper-text documents. As amended, independent Claim 1 recites a step of monitoring access patterns of a second application to the plurality of hyper-text documents, wherein the first application allows the second application to operate on the local machine independently of the operation of first application, with access to the hyper-text documents by the second application occurring independently of the first application. The monitoring identifies the plurality of hyper-text documents accessed independently by the second application.

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The other independent claims recite features generally similar to those discussed above with respect to independent Claim 1.

In rejecting independent Claim 1, as well as the other independent claims, based on the combination of Nehab et al. and Savitsky et al., the Office Action acknowledges that Nehab et al. fails to disclose the monitoring function. Instead, it is the position set forth in the Office Action that Savitsky et al. describes an independent agency program which provides a history of all the documents accessed by a client. Further, the Office Action alleges that it would have been obvious for a person of ordinary skill in the art to incorporate the agency program of Savitsky et al. into the system described in Nehab et al. to arrive at a system similar to that of the present invention. For the reasons discussed below, Applicants respectfully disagree with the position set forth in the Office Action.

Savitzky et al. relates to a method and apparatus for document processing using agents to process transactions created based on document content. That document is understood to teach an agency interposed between a browser [i.e., a client application] and a server. Because of this setup, which is illustrated for example in Figures 1, 2, 3, 4, and 5 of Savitzky et al., the browser cannot operate independent of the operation of the agency. Specifically, it follows from this disclosure that any and all commands issued by the browser, or transmissions intended for receipt by the browser, must be channeled through the agency, and the operation of the browser is thus dependent upon the operation of the agency.

For example, as understood from the disclosure of <u>Savitzky et al.</u>, if power supply to the agency of <u>Savitsky et al.</u> were interrupted, the agency would cease operating and therefore, the connection between the browser client and the server would be lost. This is in contrast to the claimed invention, in which a second application (e.g., a browser) operates on the local machine to access source documents in a manner that is independent of operations of a first application (e.g., monitoring). As would be understood, if the monitoring of the present invention were to cease operation, the operation of the browser would not be impeded, because the browser operates independently of the monitoring.

In the present invention, the access by the second application to various web pages from which the hyper-text documents are sourced is expressly performed independent of the monitoring. The agency program of <u>Savitsky et al.</u> fails to meet these criteria. In particular, the system of <u>Savitsky et al.</u> operates by interpreting the browser commands and then passing those browser commands from the client to the server, as well as operating in a similar fashion with the return data. Thus, even when combined with <u>Nehab, et al.</u> independent operation would not be achieved.

Applicants also disagree with the Office Action's assertion that "there is no bidirectional communication here as asserted by the Applicants." Specifically, Figure 3 of <u>Savitsky et al.</u> is understood to show that the connections between the agency and the browser client are bidirectional. Also, it is understood from column 10, line 19, through column 11, line 21, that a request made by the client to the server will necessitate an instruction being passed from the client to the agency and then from the agency to the server, and the server will respond via the agency to the client.

For the foregoing reasons, even if one of ordinary skill in the art were to combine the agency program of <u>Savitsky, et al.</u> with the disclosure of <u>Nehab, et al.</u>, the combined operation would still not achieve the independent operation of the first and second applications generally recited in the independent claims of the present application, Applicants submit the rejections are improper.

The <u>Hayashi, et al.</u> patent was cited for teaching "maximizing the number of hyper-text documents on each page ...."; however, Applicants submit the <u>Hayashi, et al.</u> patent fails to remedy the deficiencies noted above with respect to <u>Nehab, et al.</u> and <u>Savitsky, et al.</u>

Therefore, Applicants submit that none of the cited patents, whether taken alone or in combination, suggests the features of independent Claim 1, and in particular, monitoring access patterns of a second application independently of operations of the first application. Applicants submit that the other independent claims are variously directed to methods, computer implemented methods, computer systems, computer readable media, computer program products, and computer apparatuses, each of which recites patentable features along the lines of those discussed above with respect to independent Claim 1. Of course, the language specifically recited from claim to claim varies and Applicants submit that each independent claim should be considered on its own merit.
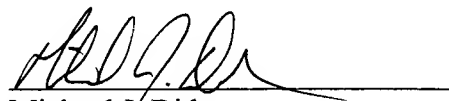
The remaining claims each depend from one of the independent claims discussed above. Applicants submit that these claims are patentable over the documents of record for reasons noted above with respect to the independent claims from which they

depend, and for reciting features of the invention still further distinguishing over the applied documents.

For the foregoing reasons, Applicants request withdrawal of the rejections under § 103.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to the below-listed address.

Respectfully submitted,

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